



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VI

1201 ELM STREET

DALLAS, TEXAS 75270

*File*  
[Redacted]

January 26, 1981

CERTIFIED MAIL: RETURN RECEIPT REQUESTED NO. 7842317

American Cyanamid Company  
600 N. Jones Street  
Fort Worth, Texas 76106

TXD 008017261

Dear Sir:

Recently, this agency received information which indicated that there may have been hazardous wastes improperly disposed of at your plant site. In order to detect and prevent any possible environmental contamination and degradation that might result from such disposal, it is necessary that this agency ascertain what, if any, hazardous waste disposal actions were conducted at, or were originated from, your plant site. To that end, please answer the following questions.

1. During the period 1955 to the present, were hazardous wastes disposed of at your plant site?

a. If so, state a brief chemical description and trade name of such wastes and state the manner and location of their disposal.

2. Were any hazardous wastes disposed of during the period 1966-1975, in an area on the southeast portion of your plant site beginning at an area approximately 200 feet southeast of the Zerogel Building and running to the southeast approximately 100 yards, being approximately 500 yards in width?

a. If so, state a brief chemical description and trade name of such hazardous waste.

b. What was the manner of their disposal?

3. Were any hazardous wastes originating from your Michigan City, Indiana, plant disposed of at your plant site during the period from 1966 through 1975?

a. If so, state a brief chemical description and trade name of such hazardous waste.

b. What was the manner of disposal?

c. Where on your site were such wastes disposed of?

4. Were any hazardous wastes originating from experimental operations at your plant site, disposed of at your plant site during the period 1960-1975?

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- a. If so, state a brief chemical description and trade name of such hazardous waste.
  - b. Where on your plant site were such wastes disposed of and what was the manner of disposal?
5. Was a cylinder (or cylinders) of hydrogen cyanide ever disposed of on the site described in question No. 2?
  - a. If so, describe with particularity where, and in what manner, it was disposed of.
6. Was a single metal drum of hazardous waste, accompanied by a uniformed guard, placed under water in a pit on the east side of the specialty building during the period 1965-1969?
  - a. If so, what hazardous substance did this metal drum contain (state brief chemical description and trade name)?
  - b. What was the manner of disposal of such hazardous waste?
7. Did a firm named Beal Construction Company haul hazardous waste sludge from your plant site during the period 1966-1978?
  - a. If so, state a brief chemical description and trade name of such waste.
  - b. Were any such hazardous wastes hauled to a place known as Beal's Ranch?
  - c. If so, what is the location of Beal's Ranch, and who is the owner?
  - d. If not, where were such wastes hauled?

The phrase "hazardous waste", when used in this letter, refers to the term as defined at 42 U.S.C. 6903(5) and includes any of those substances listed as hazardous waste at 40 CFR Part 261. The authority for this request is contained in 42 U.S.C. 6927, and in Section 3007 of the Resource Conservation and Recovery Act of 1976, as amended. The written statements submitted pursuant to this request must be notarized and returned under an authorized signature certifying that they are true and accurate to the best of the signatory's knowledge and belief. Moreover, any documents submitted to the Environmental Protection Agency, Region 6, pursuant to this request must be certified as authentic to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submittal of the requested information, that any portion of the submission certified as true is false or incorrect, the signatory should notify Region 6. If any answer certified as true is found subsequently to be untrue, the signatory may be prosecuted under 18 U.S.C. 1001.

The information requested herein must be provided regardless of its possible characterization as confidential information or trade secrets. Should you so request, any information which the Administrator of the Agency determines constitutes confidential business information will be entitled to protection as trade secrets and will be maintained confidentially, in accordance with 40 CFR Part 2. Request for confidential treatment must be made when the information is provided, since information not so identified will not be accorded this protection by the Agency.

If you have any questions regarding this request, please contact Jim Turner, attorney, U.S. Environmental Protection Agency, 1201 Elm Street, First International Building, Dallas, Texas 75270, telephone (214) 767-2760. Please direct your response to Mr. Turner's attention.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diana Dutton".

Diana Dutton  
Director  
Enforcement Division (6AE)